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Attachments: [CompERATMComments_Highlighted_Issues.doc](#)
[PREComments2004_Highlight.doc](#)

Just for fun, I pulled out some (but not all) comments on the historical PRE approach documents and Eco Comprehensive Synopsis report (the precursor to the Round 2 Comp Report for eco). I think it is clear from these comments that some of the issues with the risk assessment have been articulated clearly in the past by EPA, and yet have not been followed in subsequent risk assessment iterations. Keep in mind that we never really had a "work plan" or an "analysis plan" that was agreed on for the ecological risk assessment. I believe the Comprehensive report was supposed to be that vehicle. It is also clear that direction and concepts for how it should look are were provided in these comments over several of years. Unfortunately, if you compare these comments with some of the comments on the recent LWG submittal of the Round 2 Report it is clear that many of them are the same (e.g. scale). I quickly highlighted a few.

I just hope as we move forward with the analysis plan that we can find an effective mechanism to resolve these differences once and for all so that we can have better agreement on the baseline risk assessment.

-Jennifer

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